

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF LOUISIANA

SHREVEPORT DIVISION

RECEIVED
IN LAFAYETTE, LA.

JUN 15 2011

TONY R. MOORE, CLERK
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UNITED STATES OF AMERICA

VERSUS

JOHN DOE #1 a.k.a. twitched	(1)	* CRIMINAL NO. * 5:11CR00146
JOHN DOE #2 a.k.a. howardhughes	(2)	* 18 U.S.C. 2251(d)(1) & (e) * 18 U.S.C. 2252A(a)(2)(A) &(b)(1)
JOHN DOE #3 a.k.a. PredX	(3)	*
JOHN DOE #4 a.k.a. VladimirPutin	(4)	*
JOHN DOE #5 a.k.a. Damit	(5)	*
JOHN DOE #6 a.k.a. MrSalty a.k.a. milkduds a.k.a. urinalcake	(6)	*
JOHN DOE #7 a.k.a. checkmate a.k.a. timesink	(7)	*
JOHN DOE #8 a.k.a. unclebuck81	(8)	*
JOHN DOE #9 a.k.a. prjb a.k.a. koan	(9)	*
JOHN DOE #10 a.k.a. zapper a.k.a. jmagic	(10)	*

JOHN DOE #11	(11)	*
a.k.a. Rudy		*
		*
JOHN DOE #12	(12)	*
a.k.a. Templar		*
a.k.a. shuffle		*
		*
JOHN DOE# 13	(13)	*
a.k.a. korneech08		*
		*
JOHN DOE #14	(14)	*
a.k.a. wildman		*
		*
JOHN DOE #15	(15)	*
a.k.a. samsackk		*
		*
JOHN DOE #16	(16)	*
a.k.a. Kitsu		*
		*
JOHN DOE #17	(17)	*
a.k.a. mokoloko69		*
		*
JOHN DOE #18	(18)	*
a.k.a. PataPata		*
		*
JOHN DOE #19	(19)	*
a.k.a. zaxx		*
a.k.a. zaxxter		*
		*
JOHN DOE #20	(20)	*
a.k.a. TheShadow		*
		*
JOHN DOE # 21	(21)	*
a.k.a. Camy		*
a.k.a. Blondie		*
a.k.a. Lorwyn		*
		*
JOHN DOE # 22	(22)	*
a.k.a. DaMan		*
		*

MOTION TO SEAL INDICTMENT

NOW into Court, comes the United States, through the undersigned Assistant United States Attorney for the Western District of Louisiana, who respectfully requests that the above entitled Indictment be sealed. The United States further requests that

the Indictment remain sealed until the United States District Court for the Western District of Louisiana orders it unsealed or all of the named defendants have been arrested, for the following reasons:

Pursuant to arrests warrants that have been issued, it is expected that several of the defendants listed in the above entitled Indictment will be arrested in various jurisdictions around the United States. Based upon the nature of the case, if any part of the Indictment is unsealed, in any jurisdiction, prior to all of the listed defendants' arrests, defendants will likely flee the jurisdiction of the Court and evidence will be destroyed.

It is well settled that preventing the destruction of evidence and the flight of indicted fugitive defendants is a legitimate basis to require that the Indictment remain sealed pending the arrests of all of the defendants. Provided the government has a legitimate purpose in sealing, or keeping sealed, an Indictment, the Court may do so. United States v. Sharpe 995 f.2d 1993 (5th Cir. 1993).

In order to balance the right of the arrested defendants to know the nature of the charges against them, with the need to keep the Indictment secret, the United States requests that each defendant and their attorney be given a redacted copy of the Indictment at the time of the initial appearance. The Indictment will not be read in open court and at the close of the hearing the defendant's copy of the Indictment will be returned to the Court. The defense counsel will be allowed to keep his copy of the Indictment but will be ordered not to publicly disclose the contents of the Indictment except in communications with the defendant unless authorized by this Honorable Court.

WHEREFORE the United States prays that this Honorable Court grant the motion to seal the Indictment.

RESPECTFULLY SUBMITTED:

STEPHANIE A. FINLEY
United States Attorney


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